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Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

CHANDRA HEWES,

Plaintiff,

v.

TARGET CORPORATION,

Defendant.

Civil No. 3:17-cv-00281-AC

**ANSWER TO PLAINTIFF'S
COMPLAINT**

JURY TRIAL REQUESTED

COMES NOW Defendant Target Corporation (hereinafter referred to as
“Target”), by and through its attorney, William H. Stockton of Brisbee & Stockton LLC,
and answers Plaintiff's Complaint as follows:

1.

Based upon information and belief, Defendant Target admits paragraphs 1, 2, and 3. Defendant Target further admits that Plaintiff Chandra Hewes was an invitee on the Target premises on or about January 17, 2015.

2.

Except as specifically admitted above, Defendant Target denies or does not have sufficient information and believe to admit or deny the remaining allegations and claims such that all remaining allegations and claims of Plaintiff's Complaint are denied.

AS A FURTHER SEPARATE ANSWER AND DEFENSE, Defendant Target states as follows:

3.

Defendant Target states that Plaintiff Chandra Hewes's fall and any resulting injuries from that fall were the result of Plaintiff Chandra Hewes's own conduct, fault and negligence in the following particulars:

(a) Plaintiff failed to keep a proper lookout for conditions or circumstances that might exist in Target that might pose a danger to her given the circumstances, and

(b) Plaintiff failed to walk around or otherwise avoid conditions and circumstances that might pose a danger to her given the circumstances that she encountered.

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WHEREFORE, Defendant Target prays for a judgment of dismissal in its favor, together with a judgment for its costs and disbursements incurred in defending this lawsuit.

DATED this 22nd day of February, 2017.

BRISBEE & STOCKTON LLC

By: _____/s/ William H. Stockton _____
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